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September 14, 2015

VIA ECF

Honorable Valerie E. Caproni
United States District Judge
United States District Court
Southern District of New York
40 Foley Square
New York, NY 10007

Re: O.W. Bunker-Related Interpleader Actions (See Schedules 1 and 2)

Dear Judge Caproni:

We write on behalf of ING Bank N.V., as Security Agent ("ING Bank") in reference to the O.W. Bunker-related interpleader actions (the "Actions") set forth on Schedule 1 (the "Non-Stayed Actions") and 2 (the "Stayed Actions") to this letter.

We write to respectfully request two adjustments to certain of the upcoming scheduled dates in these cases in light of the current status of the bankruptcy proceedings.

This afternoon, the Debtors requested a one week adjournment of the time to file the proposed Chapter 11 Plan (the "Plan") with the consent of the Committee of Unsecured Creditors, ING Bank, and NuStar, to allow for time to fully finalize the Plan. *See* Exhibit A (Debtors' Request to Modify the First Amended Scheduling Order [Docket No. 781] With Respect to Certain Deadlines), ¶ 1.a. The Bankruptcy Court granted the Debtors' request. *See* Exhibit B.

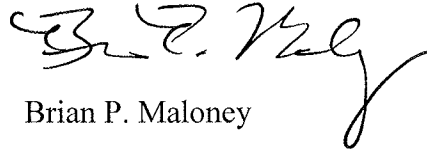
In light of this unanticipated development, we request (1) a brief adjournment of the time to file the joint letter referenced in paragraph 3 of the Court's September 14, 2015 Order and (2) a brief extension of the stay in the Stayed Actions.

First, under the revised bankruptcy scheduling order, the time for the filing of the Plan is to be adjourned six days, from September 15, 2015 until September 21, 2015. *See* Exs. A, B. In light of this adjustment, ING Bank respectfully requests a six day adjournment from September 18th until September 24th for the joint letter referred to in paragraph 3 of the Court's September 14, 2015 Order.

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Second, in light of these upcoming deadlines, as well as the continuing discovery obligations in the Non-Stayed Actions, ING Bank further requests that the stay in the Stayed Actions be extended two weeks past the current deadline set for September 25th. ING Bank respectfully requests that litigation of the Stayed Actions set forth on Schedule 2 be stayed until **October 9, 2015**, and that any request to extend the stay past October 9, 2015 be filed with the Court no later than October 2, 2015.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "B. P. Maloney", with a long, sweeping horizontal stroke extending to the right.

Brian P. Maloney

Schedule 1
O.W. Bunker-Related Interpleader Matters
(Non-Stayed Actions)

1. *Birch Shipping Ltd. v. O.W. Bunker China Ltd. (HK), et al.*
U.S.D.C., S.D.N.Y., Case No. 14 Civ. 9282 (VEC)
2. *Clearlake Shipping Pte Ltd v. O.W. Bunker (Switzerland) SA, et al.*
U.S.D.C., S.D.N.Y., Case No. 14 Civ. 9287 (VEC)
3. *Bonny Gas Transport Limited v. O.W. Bunker Germany GmbH, et al.*
U.S.D.C., S.D.N.Y., Case No. 14 Civ. 9542 (VEC)
4. *SHV Gas Supply & Risk Management SAS v. O.W. Bunker USA Inc., et al.*
U.S.D.C., S.D.N.Y., Case No. 14 Civ. 9720 (VEC)
5. *Hapag-Lloyd Aktiengesellschaft v. U.S. Oil Trading LLC, et al.*
U.S.D.C., S.D.N.Y., Case No. 14 Civ. 9949 (VEC)
6. *OSG Ship Management, Inc. v. O.W. Bunker USA Inc., et al.*
U.S.D.C., S.D.N.Y., Case No. 14 Civ. 9973 (VEC)
7. *Hapag-Lloyd Aktiengesellschaft v. O'Rourke Marine Service L.P., et al.*
U.S.D.C., S.D.N.Y., Case No. 14 Civ. 10027 (VEC)
8. *NYK Bulk & Project Carriers Ltd v. O.W. Bunker USA Inc., et al.*
U.S.D.C., S.D.N.Y., Case No. 14 Civ. 10090 (VEC)
9. *Nippon Kaisha Line Limited v. O.W. Bunker USA Inc., et al.*
U.S.D.C., S.D.N.Y., Case No. 14 Civ. 10091 (VEC)
10. *Canpotex Shipping Services Limited v. O.W. Bunkers (UK) Limited, et al.*
U.S.D.C., S.D.N.Y., Case No. 15 Civ. 1351 (VEC)
11. *SK Shipping Co., Ltd. v. NuStar Energy Services, Inc., et al.*
U.S.D.C., S.D.N.Y., Case No. 15 Civ. 2141 (VEC)
12. *U.S. Oil Trading L.L.C. v. M/V VIENNA EXPRESS, et al.*
U.S.D.C., S.D.N.Y., Case No. 15 Civ. 6718 (VEC)

Schedule 2
O.W. Bunker-Related Interpleader Matters
(Stayed Actions)

1. *UPT Pool Ltd. v. Dynamic Oil Trading (Singapore) Pte Ltd., et al.*
U.S.D.C., S.D.N.Y., Case No. 14 Civ. 9262 (VEC)
2. *Clearlake Shipping Pte. Ltd. v. O.W. Bunker (Switzerland) SA, et al.*
U.S.D.C., S.D.N.Y., Case No. 14 Civ. 9286 (VEC)
3. *MT Cape Bird Tankschiffahrts GmbH & Co. KG, v. O.W. USA Inc., et al.*
U.S.D.C., S.D.N.Y., Case No. 14 Civ. 9646 (VEC)
4. *Conti 149 Conti Guinea v. O.W. Bunker Panama S.A., et al.*
U.S.D.C., S.D.N.Y., Case No. 14 Civ. 10089 (VEC)
5. *Hapag-Lloyd Aktiengesellschaft v. O.W. Bunker North America, Inc., et al.*
U.S.D.C., S.D.N.Y., Case No. 15 Civ. 190 (VEC)
6. *APL Co. Pte Ltd v. O.W. Bunker Far East (Singapore) Pte Ltd., et al.*
U.S.D.C., S.D.N.Y., Case No. 15 Civ. 620 (VEC)
7. *Star Tankers Inc. v. O.W. Bunker Panama S.A., et al.*
U.S.D.C., S.D.N.Y., Case No. 15 Civ. 2090 (VEC)
8. *Baere Maritime LLC v. O.W. Bunker Panama S.A., et al.*
U.S.D.C., S.D.N.Y., Case No. 15 Civ. 2734 (VEC)
9. *Sigma Tankers Inc v. O.W. Bunker Panama S.A., et al.*
U.S.D.C., S.D.N.Y., Case No. 15 Civ. 2733 (VEC)
10. *MSC Mediterranean Shipping Company S.A. v. O.W. Bunker North America Inc., et al.*
U.S.D.C., S.D.N.Y., Case No. 15 Civ. 3221 (VEC)
11. *O.W. Bunker USA Inc. v. COSCO PIRAEUS, I.M.O. No. 9484364*
U.S.D.C., S.D.N.Y., Case No. 15 Civ. 3471 (VEC)
12. *O.W. Bunker USA Inc. v. M/V BAKKEDAL, in rem*
U.S.D.C., S.D.N.Y., Case No. 15 Civ. 3988 (VEC)
13. *Kawasaki Kisen Kaisha, Ltd. v. OW Bunker Middle East DMCC, et al.*
U.S.D.C., S.D.N.Y., Case No. 15 Civ. 4138 (VEC)